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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
ONE CONGRESS STREET, SUITE 1100  
BOSTON, MA 02114-2023

Records Center  
American Glue & Resin  
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**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

June 28, 1999

American Glue & Resin, Inc.  
c/o Ms. Cheryl Auterio  
1 Greenbriar Drive, Suite 304  
North Reading, MA 01864

Re: American Glue & Resin Superfund Site  
Middleton, Massachusetts

Dear Ms. Auterio:

This letter informs you that the United States Environmental Protection Agency ("EPA") intends to perfect a lien upon property located at 40 School Street, Middleton, Massachusetts (the "Property"). The property is part of the American Glue & Resin Superfund Site in Middleton, Massachusetts (the "Site"). The legal description is set forth in Enclosure 1. EPA's authority to perfect this lien arises under Section 107 (1) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. §9607(1), and commonly known as "Superfund".

EPA has determined that a release or threat of release of hazardous substances pursuant to Section 101(22) of CERCLA, 42 U.S.C. §9601(22), has occurred at or from the Property. EPA has incurred response costs performing a removal action to abate the release or threat of release of hazardous substances at the Site. Hazardous substances at the Site included, but are not limited to, volatile organic compounds (VOCs), particularly toluene and chlorinated solvents present in drums stored at the Site. Under CERCLA Section 107(a) and 101(9), 42 U.S.C. §§9607(a) and 9601(9), persons liable for EPA's response costs include persons who own any "facility" including a site or area where a hazardous substance has been deposited, stored, disposed of, placed, or otherwise came to be located.

EPA has determined that American Glue & Resin, Inc. owns the Property. As an owner of the Property, under Section 107(a), 42 U.S.C. §9607(a), American Glue & Resin, Inc. is liable to the United States for all costs of the removal action at the Site. The lien is intended to secure payment to the United States of costs and damages for incurred by EPA while responding to the release or threat of release of hazardous substances at the Site. On November 4, 1998, EPA

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notified American Glue & Resin, Inc. by certified mail of potential liability under CERCLA. American Glue & Resin, Inc. may avoid the perfection of a lien upon the property by paying all costs and damages for which it is liable.

EPA has a reasonable basis to believe that the statutory elements of perfecting this lien are satisfied. A Lien Filing Record consisting of documents relating to its decision to perfect the lien has been assembled and may be reviewed and/or copied by arrangement with Tina Hennessy, at the address listed below:

Tina Hennessy, Enforcement Coordinator  
U.S. Environmental Protection Agency  
Office of Site Remediation & Restoration  
One Congress Street, Suite 1100 (HBR)  
Boston, MA 02114-2023  
(617) 918-1216

After fourteen (14) calendar days from the date you receive this letter, EPA intends to transmit a notice of lien to Essex County Registry of Deeds, to perfect the lien upon the Property.

A lien arising in favor of the United States on the Property continues until the liability for costs is satisfied or until the liability for costs becomes unenforceable through operations of the statute of limitations in CERCLA Section 113, 42 U.S.C. §9613.

You may notify EPA in writing within fourteen (14) calendar days of the receipt of this letter if you believe EPA's information or determination is in error. You should describe in your letter reasons for believing that EPA does not have a reasonable basis to perfect the lien, include documents or information supporting your contentions, and send it to the EPA attorney listed below.

You may also request an opportunity to appear before a neutral EPA official to present information indicating that EPA does not have a reasonable basis to perfect the lien. Submissions or requests for an opportunity to appear before a neutral EPA official should: (1) be in writing within fourteen (14) calendar days from the receipt of this letter; (2) include documents or information supporting your contentions; (3) reference the American Glue and Resin Superfund Site; and (4) be sent to the EPA attorney at the following address:

Marcia Lamel, Senior Enforcement Counsel  
U.S. Environmental Protection Agency  
Office of Environmental Stewardship (SES)  
One Congress Street, Suite 1100  
Boston, MA 02114-2023  
(617) 918-1778

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If EPA receives a written submission from you within fourteen (14) calendar days from the date you receive this letter, EPA staff will review your submission. If, after review and consultation, EPA agrees that the Agency does not have a reasonable basis upon which to perfect a lien, EPA will not proceed to perfect the lien, and will notify you in writing. If however, EPA determines that there is a reasonable basis to proceed, the information you submitted, along with the Lien Filing Record, will be referred to a neutral EPA official for review or a meeting.

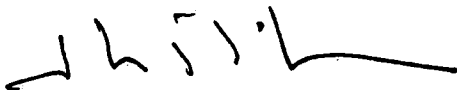
If you have requested an opportunity to appear before a neutral EPA official, an informal meeting will be scheduled. You may chose to attend this meeting in person or via teleconference. EPA will be represented by its enforcement staff, including the case attorney. You may be represented by counsel at this meeting. At the meeting, you may provide information as to why the EPA's determination requires reconsideration. The meeting will not be conducted using rules of evidence or formal administrative or judicial procedures. The sole issue to be addressed at the meeting is whether EPA has a reasonable basis to perfect its lien under Section 107(1) of CERCLA, 42 U.S.C. §9607(1).

After review of the written information you submitted, and/or a meeting if one is requested, the neutral EPA official will issue a recommended decision. The decision will be forwarded to the EPA official with the authority to execute this lien. You will be provided with written notification of EPA's action and furnished a copy of the recommended decision. Except as provided by Section 113(h) of CERCLA, 42 U.S.C. §9613(h), you may not obtain judicial review or reconsideration of EPA's decision.

Finally, in the event that you do not submit information or request a meeting, neither your nor EPA is prohibited from asserting any claims or defenses in the future as a result of the recommended decision.

If you have any questions pertaining to this letter please contact Marcia Lamel, Senior Enforcement Counsel at (617) 918-1778.

Sincerely,



John P. DeVillars  
Regional Administrator

Enclosure

cc: Marcia Lamel, Senior Enforcement Counsel  
Tina Hennessy, EPA Enforcement Coordinator  
Michael Murphy, Regnante, Sterio & Osborne, LLP